

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

TAVARES HUNT, et al.,)	
)	
Plaintiffs,)	
)	
vs.)	Case No. 09 cv-02071
)	
THOMAS DART, in his Official Capacity as)	Judge Matthew Kennelly
Sheriff of Cook County, et al.)	
)	
Defendants.)	
)	

**LANG’S UNOPPOSED MOTION FOR LEAVE TO FILE RESPONSIVE PLEADING
TO PLAINTIFFS’ FOURTH AMENDED COMPLAINT, *INSTANTER***

Defendant, J. Lang (“Lang”), by and through her undersigned counsel, Timothy J. Young, Lisa M. Taylor and Ruth E. Goldwater McCoy of Lewis, Brisbois, Bisgaard & Smith, LLP., states in support of her Unopposed for Leave to File her Responsive Pleading to Plaintiffs’ Fourth Amended Complaint, *Instanter*, as follows:

1. By Order dated June 22, 2010, this Honorable Court granted Lang up to and including July 1, 2010, to file a response to Plaintiffs’ Fourth Amended Complaint.
2. Due to unforeseen circumstances, the filing did not take place on July 1, 2010.
3. Lang respectfully requests leave to file her responsive pleading to Plaintiffs’ Fourth Amended Complaint, *instanter*. (A true and correct copy of Lang’s responsive pleading is attached hereto as Exhibit A).
4. There is no pending trial date in this case at bar. Therefore, an additional five (5) days from July 1, 2010, to respond to Plaintiffs’ Fourth Amended Complaint will not impact the Court’s resources or any of the parties.

5. The undersigned attorney spoke with an attorney from Lyndsay D. Speece's office, one of Plaintiffs' attorneys, and Plaintiffs' counsel has no objection to this extension of time on behalf of Lang.

6. This case is scheduled for a status conference in Your Honor's Chambers on August 26, 2010.

7. No party will be prejudiced by the granting of this Motion.

8. A denial of this Motion will cause great prejudice to Lang.

9. This Motion is filed in good faith and not for the purposes of delay.

WHEREFORE, Defendant, J. Lang, respectfully requests that this Honorable Court enter an Order, granting this Motion for Leave to File her Responsive Pleading to Plaintiffs' Fourth Amended Complaint, *Instantly*, and for such other and further relief as this Honorable Court deems just and proper.

Respectfully submitted,

J. Lang

By: /s/ Ruth E. Goldwater McCoy
One of J. Lang's Attorneys

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